

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
WWW.WBK LAW.COM
LAWRENCE MOVSHIN
TEL. 202.383.3338

May 9, 2014

By Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Communication, GN Docket No. 12-268, In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*

Dear Ms. Dortch,

This letter is submitted, pursuant to Section 1.1206(b)(1) of the FCC's rules, to notify you that representatives of the WMTS Coalition (the "Coalition") met on May 7, 2014, with Commissioner Mignon Clyburn and her Legal Advisor, Louis Peraertz. The WMTS Coalition was represented by Rick Pollack, the Executive Vice President, Advocacy and Public Policy, of the American Hospital Association (the "AHA") and his colleague Erik Rasmussen; by Scott Dukes, Vice President, Regional Operations for the Billings Clinic, Billings Montana; and by the undersigned, counsel to the AHA and the WMTS Coalition.

During the meeting, the Coalition reiterated its concern with the Incentive Auction Task Force recommendation to the Commission that Channel 37 should be authorized for use by unlicensed devices before the Commission had determined whether and how such sharing would protect WMTS licensees from interference. The Coalition provided Commissioner Clyburn the attached list of hospitals in the State of South Carolina that are currently registered to use WMTS systems operating on Channel 37 to show the breadth of use of this frequency band. The Coalition reiterated that the effectiveness of WMTS systems is of major importance to hospitals' ability to monitor critical care patients, including cardiac patients, other major surgical patients, and even mothers and their fetuses during labor and delivery. The Coalition emphasized that WMTS licensees cannot accept any risk that there will be interference to those systems that would adversely impact the health care providers' monitoring capability. The Coalition used the attached maps to demonstrate that the risks of harmful interference to a WMTS system may not be worth the little benefit in urban and suburban areas that will be gained by making Channel 37 available for unlicensed uses.

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In closing, the Coalition asked Commissioner Clyburn to consider seeking to add a very strong statement in the Order to show the healthcare community that their use of Channel 37 WMTS will not be compromised, such as the proposed language attached to this letter.

Please contact the undersigned if you have any questions.

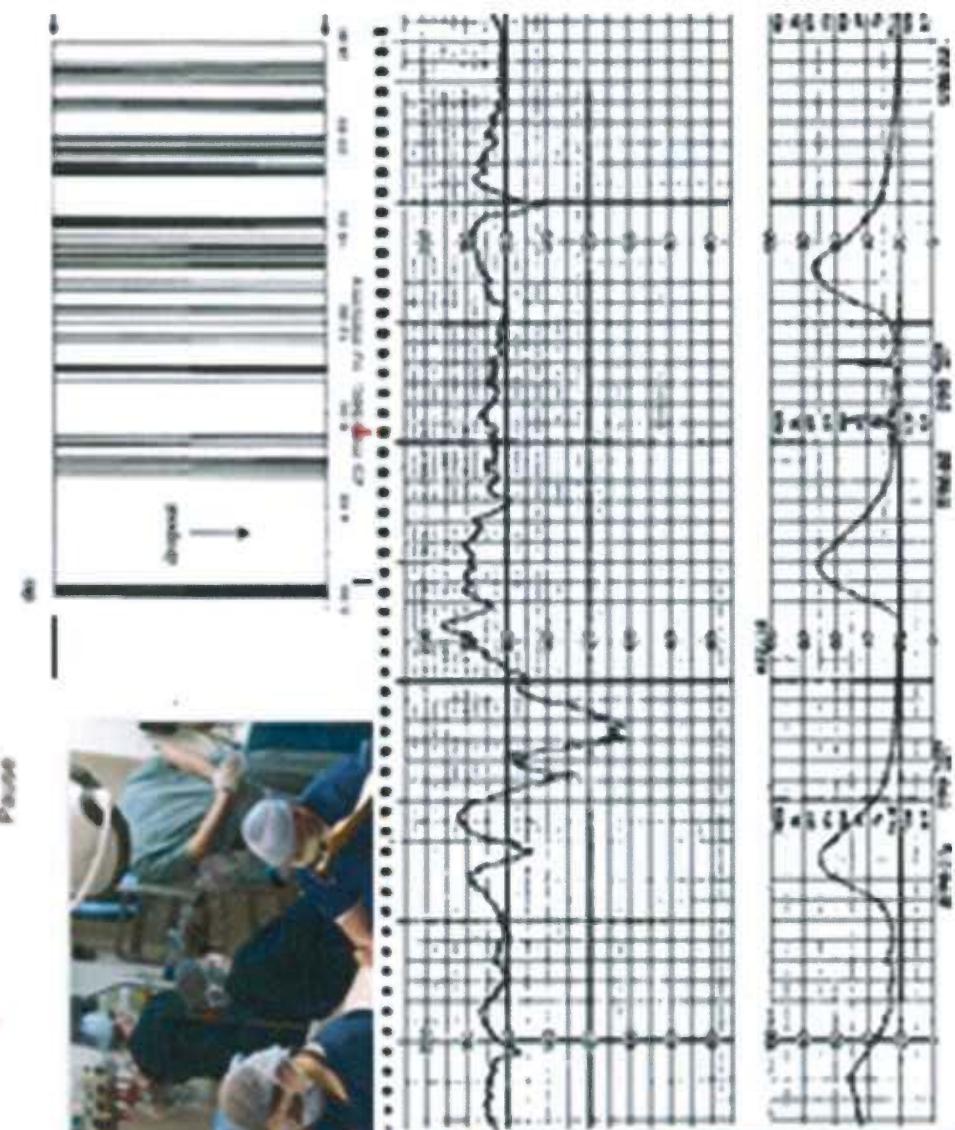
Sincerely,

/s/
Lawrence J. Movshin

Attachments

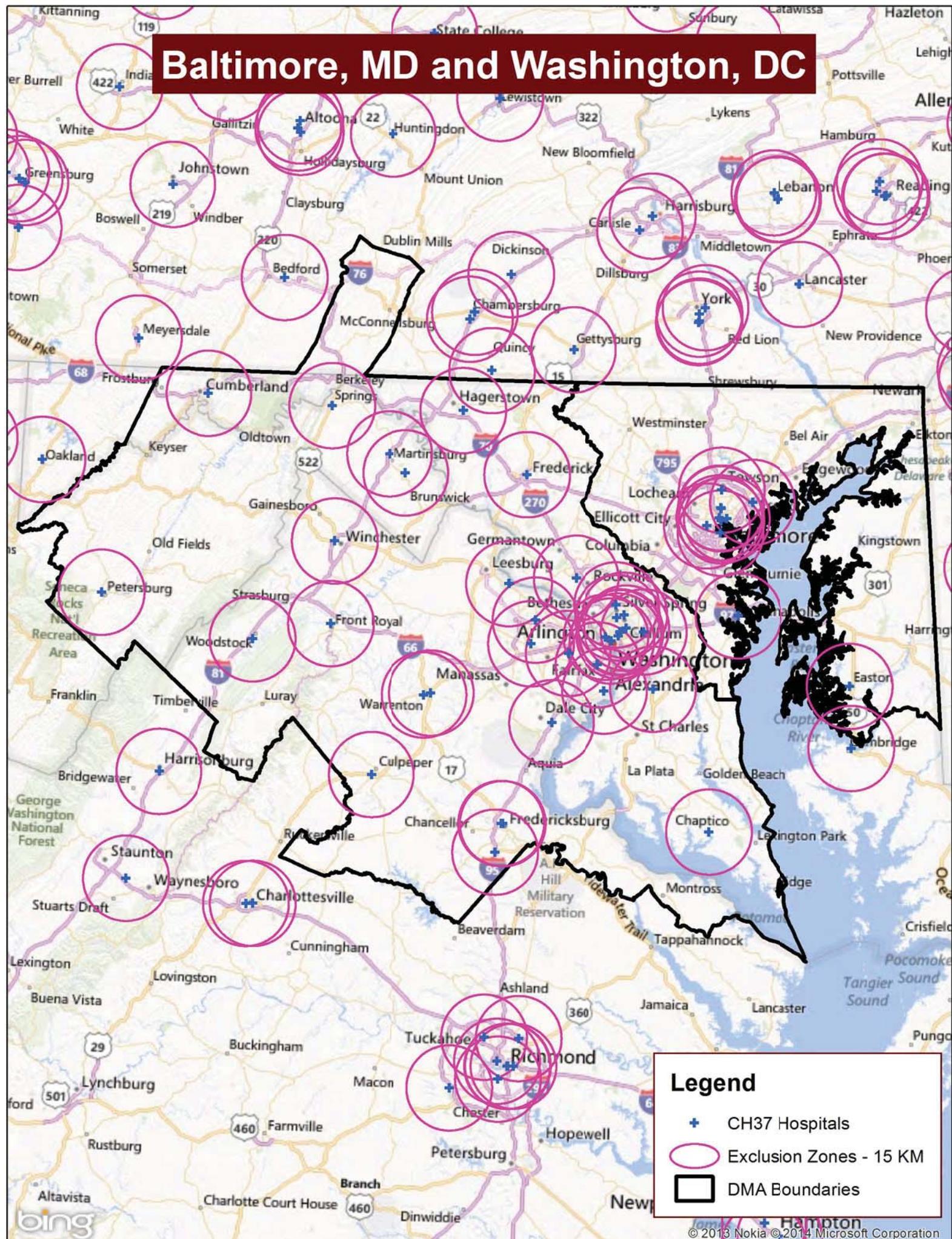
cc: Louis Peraertz

Impact on Patient Care



Hospital	Registration Address	City	County	Systems	Transmitters
Greenville Memorial Hospital	701 Grove Road	Greenville	Greenville	2	168
Providence Hospital	2435 Forest Drive	Columbia	Richland	1	161
Lexington Medical Center	2720 Sunset Boulevard	West Columbia	Lexington	2	128
Spartanburg Regional Medical Center	101 East Wood St	Spartanburg	Spartanburg	1	105
Conway Medical Center	300 Singleton Ridge Road	Conway	Horry	2	100
Palmetto Health Richland	5 Medical Park Dr.	Columbia	Richland	5	98
Regional Medical Center of Orangeburg and Calhoun Counties	3000 St. Matthews Road	Orangeburg	Orangeburg	1	78
Self Regional Healthcare	1325 Spring Street	Greenwood	Greenwood	2	71
Springs Memorial Hospital	800 West Meeting Street	Lancaster	Lancaster	2	68
Waccamaw Community Hospital	4070 Hwy 17 Bypass	Murrells Inlet	Georgetown	1	61
Beaufort Memorial Hospital	955 Ribaut Road	Beaufort	Beaufort	2	59
Bon Secours St. Francis Hospital	One St. Francis Drive	Greenville	Greenville	2	56
Summerville Medical Center	295 Midland Parkway	Summerville	Dorchester	1	48
Ralph H. Johnson Veterans Affairs Medical Center	109 Bee Street	Charleston	Charleston	1	44
Anmed Health	800 North Fant Street	Anderson	Anderson	2	36
Marion County Medical Center	2829 East Highway 76	Mullins	Marion	2	32
Oconee Memorial Hospital	298 Memorial Drive	Seneca	Oconee	2	25
Coastal Carolina Medical Center	1000 Medical Center Drive	Hardeeville	Jasper	1	22
Colleton Medical Center	501 Robertson Boulevard	Walterboro	Colleton	1	16
Marlboro Park Hospital	11138 Cheraw Highway	Bennettsville	Marlboro	2	16
Wallace Thomson Hospital	322 West South Street	Union	Union	1	16
Dorn VA Medical Center	6439 Garners Ferry Road	Columbia	Richland	1	10
Lexington Medical Center Lexington	811 West Main St	Lexington	Lexington	1	10
Regency Hospital of Greenville	1 St Francis Drive	Greenville	Greenville	1	8
Regency Hospital of Florence	121 East Cedar Street	Florence	Florence	1	8
East Cooper Regional Medical Center	1200 Johnnie Dodds Boulevard	Mount Pleasant	Charleston	1	7
Clarendon Memorial Hospital	10 E Hospital Street	Manning	Clarendon	1	1

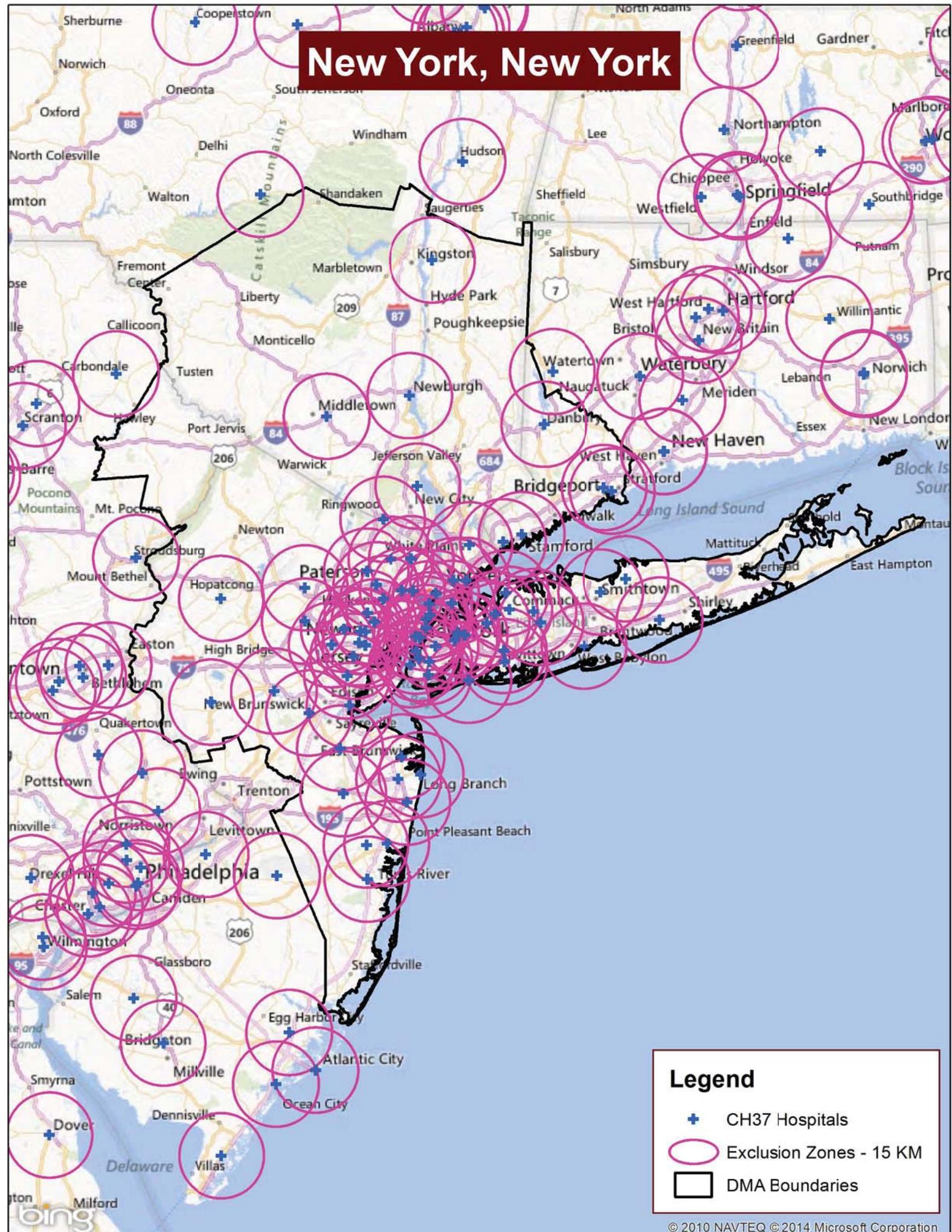
Baltimore, MD and Washington, DC



Legend

- CH37 Hospitals
- Exclusion Zones - 15 KM
- DMA Boundaries

New York, New York



Legend

- + CH37 Hospitals
 - Exclusion Zones - 15 KM
 - DMA Boundaries

WMTS Coalition proposed additional verbiage

"Although we have decided in this *Report & Order* to allow unlicensed devices to share TV Channel 37 with primary users, we recognize that WMTS cannot tolerate even a single incident of interference without jeopardizing patient care. Therefore, we will not authorize unlicensed devices to operate in Channel 37 until we have developed technical rules governing such unlicensed operation that will ensure to all affected parties' satisfaction that no harmful interference will be caused to primary WMTS and RAS operations in the band. The rulemaking we will launch later this year will be designed to develop the record necessary to achieve that objective."